

JUDGE CROTTY

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**



VITAMIN SHOPPE INDUSTRIES INC.,

Plaintiff,

v.

SEEGER WEISS LLP,

Defendant.

Civil Action No.:

COMPLAINT AND JURY DEMAND

Plaintiff, Vitamin Shoppe Industries Inc. ("Vitamin Shoppe"), by way of complaint against Defendant, Seeger Weiss LLP, states as follows:

INTRODUCTION

1. Defendant is using Plaintiff's federally registered trademarks to mislead

consumers looking for Vitamin Shoppe's BODYTECH protein supplements and direct them to Defendant's web site <www.vitaminshoppeprotein.com>. Defendant is soliciting business for a class action lawsuit against Plaintiff based on the protein supplement sold under the trademark BODYTECH. Vitamin Shoppe is seeking injunctive relief as well as damages.

PARTIES

2. Plaintiff, Vitamin Shoppe Industries Inc., is a New York corporation having its principal place of business at 2101 91st Street, North Bergen, New Jersey 07047.

3. Defendant, Seeger Weiss LLP, is a limited liability partnership organized under the laws of New York, and maintains an office at 77 Water Street, New York, New York 10005.

4. Vitamin Shoppe has standing to bring this suit because Defendant is using Vitamin Shoppe's name and trademark "Vitamin Shoppe" in its domain name and in marketing materials, is using Vitamin Shoppe's federally registered trademark BODYTECH and related trade dress in Defendant's marketing and soliciting materials, and Vitamin Shoppe has been and is being harmed by Defendant's unauthorized use of its trademarks.

JURISDICTION AND VENUE

5. This is an action for federal trademark infringement, federal unfair competition, federal dilution, cybersquatting, and related state law claims, which claims arise out of the same operative facts.

6. This Court has subject matter jurisdiction of the claims in this Complaint pursuant to 28 U.S.C. § 1331, as the case involves a federal question.

7. This Court has supplemental jurisdiction over concurrent state law and common law claims pursuant to 28 U.S.C. § 1367.

8. This Court has personal jurisdiction over Defendant because Defendant is a New York limited liability partnership, it maintains an office in New York, and it transacts business within the State of New York.

9. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) in that Defendant resides in and conducts business in this District.

BACKGROUND FACTS

10. Vitamin Shoppe is a specialty retailer and direct marketer of nutritional products. These products include vitamins and minerals, nutritional supplements, herbs, sports nutrition formulas, homeopathic remedies, and health and beauty aids.

11. Vitamin Shoppe was founded in 1977, and began as a single store in New York City. Vitamin Shoppe now has over 500 THE VITAMIN SHOPPE stores located nationwide.

12. Vitamin Shoppe began operations during a time when consumers were looking for alternatives to prescription drugs. By offering the best supplements, vitamins and minerals at competitive prices, Vitamin Shoppe fulfilled a need that no other retailer was providing at the time.

13. In addition to THE VITAMIN SHOPPE brick and mortar stores, Vitamin Shoppe owns and operates an online store at <www.vitaminshoppe.com> selling vitamins, supplements, including protein supplements, and nutritional products throughout the United States.

14. Today, Vitamin Shoppe offers over 18,000 items under more than 400 brand names. This includes Vitamin Shoppe's brands THE VITAMIN SHOPPE and BODYTECH.

15. Vitamin Shoppe's annual sales of product are approximately one billion dollars.

16. Vitamin Shoppe promotes its trademarks THE VITAMIN SHOPPE and

BODYTECH through print and internet based advertising. Vitamin Shoppe also advertises and promotes its goods and services through social media sites such as Facebook at <www.facebook.com/THEVITAMINSHOPPE>, Twitter at <<http://twitter.com/#!/VitaminShoppe>>, Instagram at <<http://instagram.com/vitaminshoppe#>>, and Pinterest at <<https://www.Pinterest.com/vitaminshoppe/>>.

17. Vitamin Shoppe spends over \$400,000 annually in advertising and promoting its trademark THE VITAMIN SHOPPE.

18. Since 1977, Vitamin Shoppe has been providing retail sales of vitamins, supplements, and nutritional products under the trademark THE VITAMIN SHOPPE.

19. Since at least as early as 1986, Vitamin Shoppe started selling its own product line under the trademark THE VITAMIN SHOPPE.

20. Vitamin Shoppe is the owner of U.S. Trademark Registration No. 2,481,640 for the trademark THE VITAMIN SHOPPE, which registration issued August 28, 2001. This registration is valid and subsisting, and in full force and effect. A true and correct copy of the registration is attached at **Exhibit 1** and incorporated by reference.

21. Trademark Registration No. 2,481,640 for the trademark THE VITAMIN SHOPPE covers “Non-medicated skin treatment creams, hair shampoos and bath and shower gels; and aromatherapy oils” in International Class 3, and “Vitamins, vitamin and mineral supplements, and nutritional supplements” in International Class 5.

22. Trademark Registration No. 2,481,640 has become incontestable by virtue of Section 15 of the Lanham Act, 15 U.S.C. § 1065.

23. Trademark Registration No. 2,481,640 is, by virtue of its incontestability,

conclusive evidence of the validity of the registered trademark THE VITAMIN SHOPPE, of Vitamin Shoppe's ownership of the trademark, and of Vitamin Shoppe's exclusive right to use the trademark in commerce, 15 U.S.C. § 1115.

24. Vitamin Shoppe is the owner of U.S. Trademark Registration No. 2,481,906 for the trademark THE VITAMIN SHOPPE, which registration issued August 28, 2001. This registration is valid and subsisting, and in full force and effect. A true and correct copy of the registration is attached at **Exhibit 2** and incorporated by reference.

25. Trademark Registration No. 2,481,906 for the trademark THE VITAMIN SHOPPE covers “Retail store services, mail order catalog services and online retail store services provided via a global computer network featuring vitamins, nutritional supplements, books, herbal products, aromatherapy products, bath and shower products, skin treatment creams, and related items” in International Class 35.

26. Trademark Registration No. 2,481,906 has become incontestable by virtue of Section 15 of the Lanham Act, 15 U.S.C. § 1065.

27. Trademark Registration No. 2,481,906 is, by virtue of its incontestability, conclusive evidence of the validity of the registered trademark THE VITAMIN SHOPPE, of Vitamin Shoppe's ownership of the trademark, and of Vitamin Shoppe's exclusive right to use the trademark in commerce, 15 U.S.C. § 1115.

28. Since at least 2001, Vitamin Shoppe has been selling nutritional supplements under the trademark BODYTECH.

29. Vitamin Shoppe is the owner of U.S. Trademark Registration No. 2,872,484 for the trademark BODYTECH, which registration issued August 10, 2004. This registration is

valid and subsisting, and in full force and effect. A true and correct copy of the registration is attached at **Exhibit 3** and incorporated by reference.

30. Trademark Registration No. 2,872,484 for the trademark BODYTECH covers “Dietary and nutritional supplements” in International Class 5.

31. Trademark Registration No. 2,872,484 has become incontestable by virtue of Section 15 of the Lanham Act, § 1065.

32. Trademark Registration No. 2,872,484 is, by virtue of its incontestability, conclusive evidence of the validity of the registered trademark BODYTECH, of Vitamin Shoppe's ownership of the trademark, and of Vitamin Shoppe's exclusive right to use the trademark in commerce, 15 U.S.C. § 1115.

33. Vitamin Shoppe owns the domain name <vitaminshoppe.com>, and has had the domain name since 1996.

34. Vitamin Shoppe owns numerous other domain name registrations that incorporate the terms “Vitamin Shoppe”, including, for example, the domain names <vitaminshoppe.org>, <koshervitaminshoppe.com>, <myvitaminshop.com>, <thevitaminshop.us>, <thevitaminshoppe.com>, <thevitaminshoppe.info>, <thevitaminshoppe.net>, <thevitaminshoppe.org>, <thevitaminshopper.com>, <vitaminshoppecoupon.com>, <vitaminshoppefranchising.com>, and <vitaminshoppeinternational.com>.

35. Vitamin Shoppe's products can be purchased at brick and mortar stores, and through the company's online store.

36. One line of products that Vitamin Shoppe offers for sale and sells are BODYTECH branded products.

37. The BODYTECH product line includes protein supplements, vitamins, minerals, and other dietary and nutritional supplements.

38. Vitamin Shoppe's web site, <www.vitaminshoppe.com>, offers for sale and sells BODYTECH protein supplements.

39. The BODYTECH protein supplements are sold in distinctive blue containers with labels that display the BODYTECH trademark and trade dress, such as the ones shown below:



40. Vitamin Shoppe is the second largest specialty retailer in retail sales of vitamins, minerals, and nutritional supplements in the United States.

41. Defendant is a law firm that promotes itself as handling class action lawsuits.

42. Defendant promotes itself through the web site <www.seegerweiss.com>.

43. At the <www.seegerweiss.com> web site, Defendant lists the firm's practice areas and also lists "Current Investigations" in the areas of food, drug injury, medical devices, product

liability, and others. Listed under these categories are subjects that are claimed to be under investigation. Clicking on any one of the subjects takes the user to another web page within the <www.seegerweiss.com> web site that will provide additional information on the investigation.

44. At the <www.seegerweiss.com> web site Defendant solicits information from potential class action plaintiffs by requesting that individuals “tell [Seeger Weiss] about your experience” by filling out an online form. BODYTECH protein supplements are not one of the products on the <www.seegerweiss.com> web site.

45. On information and belief, Defendant controls the domain name <vitaminshoppeprotein.com> and the web content displayed at the web site associated with that domain name.

46. Defendant’s name “Seeger Weiss” appears throughout the web site, a link to Defendant's web site <www.seegerweiss.com> appears on the <www.vitaminshoppeprotein.com> web site, and the copyright notice for the <www.vitaminshoppeprotein.com> web site is in the name of Defendant. There is also a statement on the <www.vitaminshoppeprotein.com> web site that the “content in this web site was prepared and is copyrighted by Seeger Weiss [Defendant]”.

47. On information and belief, the web site associated with the domain name <www.vitaminshoppeprotein.com> is authorized by and controlled by Defendant.

48. On information and belief, Defendant is soliciting information from individuals on the web site <www.vitaminshoppeprotein.com> for a potential class action lawsuit against Vitamin Shoppe and its BODYTECH protein supplements.

49. The domain name <vitaminshoppeprotein.com> was registered as of August 29,

2013.

50. On information and belief, <www.vitaminshoppeprotein.com> is the only web site that Defendant has created for its investigations.

51. The landing page for the domain name <vitaminshoppeprotein.com> prominently refers to three of Vitamin Shoppe's BODYTECH protein supplement products, and displays the following photographs of the BODYTECH protein supplements in their distinctive blue containers:



52. A true and correct copy of a printout of the landing page for the domain name <vitaminshoppeprotein.com> is attached as **Exhibit 4** and incorporated by reference.

53. On information and belief, Defendant copied the photographs of the BODYTECH protein supplements from Vitamin Shoppe's web site without authorization.

54. On information and belief, Defendant registered the domain name <vitaminshoppeprotein.com> in order to reach internet users who are looking for Vitamin

Shoppe's protein supplements, intercept and lure them to Defendant's web site <www.vitaminshoppeprotein.com>, and solicit their business by asserting that they may be "entitled to compensation".

55. On information and belief, Defendant is using the <www.vitaminshoppeprotein.com> web site and the BODYTECH trademark and trade dress to mine information from consumers of Vitamin Shoppe's BODYTECH protein supplements for the purpose of filing a class action lawsuit against Vitamin Shoppe.

56. Defendant is using the <vitaminshoppeprotein.com> domain name and the BODYTECH trademark and trade dress in commerce to solicit business.

57. Defendant is using Vitamin Shoppe's name and trademarks to lure individuals to its web site <www.vitaminshoppeprotein.com> where Defendant makes disparaging statements about Vitamin Shoppe and its BODYTECH protein supplements.

58. The combination of the domain name <vitaminshoppeprotein.com>, the BODYTECH trademark, and the trade dress of the BODYTECH protein supplements on the <www.vitaminshoppeprotein.com> home page misleads consumers into believing that Defendant's web site is associated with, sponsored by, or authorized by Vitamin Shoppe.

59. Once on the <www.vitaminshoppeprotein.com> web site, consumers are lead to believe that there is something dangerous with BODYTECH protein supplements by making statements that "You may be entitled to compensation." and "Get Justice. Don't Be a Victim."

60. Within the metatags associated with Defendant's web site <www.vitaminshoppeprotein.com> are the statements "Vitamin Shoppe Protein Lawsuit" and "Vitamin Shoppe Protein Lawsuit Information". A true and accurate printout of the source code

for the landing page for Defendant's web site <www.vitaminshoppeprotein.com> is attached as **Exhibit 5** and incorporated by reference.

61. The metatags associated with the web site <www.vitaminshoppeprotein.com> cause web search engines to return search results that falsely indicate and mislead consumers into believing that there is a pending lawsuit against Vitamin Shoppe and its BODYTECH protein supplements. A true and accurate printout of a Google based search results for "vitaminshoppeprotein.com" is attached as **Exhibit 6** and incorporated by reference.

62. On information and belief, Defendant has purchased from internet search engines search terms that incorporate the term "Vitamin Shoppe", including misspellings of the term.

63. On information and belief, the search terms Defendant purchased include "Vitamin Shoppe", misspellings of "Vitamin Shoppe", and "Vitamin Shoppe Coupon".

64. On information and belief, Defendant purchased the search terms for purposes of having its advertisements appear on the initial page of the search results for the purchased search terms.

65. Defendant's advertisements associated with the purchases search terms make disparaging statements that Vitamin Shoppe's products are faulty, and falsely indicate that a lawsuit is pending against Vitamin Shoppe. The web site associated with Defendant's advertisements is Defendant's web site <www.vitaminshoppeprotein.com>. True and accurate printouts from various Google based search results displaying Defendant's advertisements resulting from the purchased search terms "vitamin shoppe", "the vitamin shop", and "vitamin shoppe coupon" are attached as **Exhibit 7** and incorporated by reference.

66. Vitamin Shoppe is required by federal law to investigate and report to the Food

and Drug Administration (“the FDA”) any notice that it receives concerning an adverse event associated with the use of a dietary supplement. Federal law requires that such report to the FDA be made within fifteen (15) business days after receiving notice of the adverse event.

67. Defendant’s use and maintenance of the web site <www.vitaminshoppeprotein.com> and the display of the BODYTECH trademark and products on that web site is likely to mislead the public into believing that by completing the form on Defendant’s web site, that they are reporting adverse events relating to the BODYTECH protein supplements to Vitamin Shoppe.

68. As a result of this confusion, Defendant’s use and maintenance of the web site <www.vitaminshoppeprotein.com> and the display of the BODYTECH trademark, trade dress and products undermines the public policy to protect the consumer, and thwarts the FDA’s process for reporting adverse events.

COUNT I
(Trademark Infringement Under § 32 of the Lanham Act)

69. Vitamin Shoppe repeats and incorporates by reference the allegations of paragraphs 1 through 68 of its Complaint as if set forth fully herein.

70. The domain name <vitaminshoppeprotein.com> is confusingly similar to Vitamin Shoppe’s registered trademark THE VITAMIN SHOPPE.

71. Defendant’s use of the domain name <vitaminshoppeprotein.com> is likely to cause confusion, mistake or deceive the public into believing that the services offered under the web site are sponsored by, approved by, or otherwise associated with Vitamin Shoppe as to cause irreparable damage and injury to Vitamin Shoppe.

72. Defendant's use of the designation BODYTECH is confusingly similar to Vitamin Shoppe's registered trademark BODYTECH.

73. Defendant's use and display of Vitamin Shoppe's trade dress and photographs of BODYTECH protein supplements is confusingly similar to Vitamin Shoppe's registered trademark BODYTECH.

74. Defendant's use of the BODYTECH trademark and trade dress is likely to cause confusion, mistake or deceive the public into believing that the services offered by Defendant are sponsored by, approved by, or otherwise associated with Vitamin Shoppe as to cause irreparable damage and injury to Vitamin Shoppe.

75. Defendant's use of the domain name <vitaminshoppeprotein.com>, the BODYTECH trademark and trade dress, and Vitamin Shoppe's photographs of BODYTECH protein supplements is likely to deceive the public into believing that Defendant's web site is for reporting adverse events to Vitamin Shoppe.

76. Defendant's use of the domain name <vitaminshoppeprotein.com> and the trademark BODYTECH interferes with Vitamin Shoppe's responsibility to report adverse events and interferes with the FDA's reporting regulations.

77. Defendant's actions constitute trademark infringement in violation of Section 32 of the Lanham Act, 15 U.S.C. § 1114.

78. Defendant's actions have caused and will continue to cause irreparable injury to Vitamin Shoppe unless enjoined by this Court.

79. Vitamin Shoppe has no adequate remedy at law.

COUNT II
(Unfair Competition Under § 43 of the Lanham Act)

80. Vitamin Shoppe repeats and incorporates by reference the allegations of paragraphs 1 through 79 of its Complaint as if set forth fully herein.

81. Defendant is attempting to trade on and profit from the goodwill associated with the trademarks THE VITAMIN SHOPPE and BODYTECH.

82. Defendant is attempting falsely to suggest an association with Vitamin Shoppe or to trade on the goodwill of the trademarks THE VITAMIN SHOPPE and BODYTECH.

83. Defendant's use of the domain name <vitaminshoppeprotein.com>, the BODYTECH trademark and trade dress, and Vitamin Shoppe's photographs of the BODYTECH protein supplements is likely to cause confusion as to the source or sponsorship of Defendant's services.

84. Defendant's actions are likely to cause confusion as to the source or sponsorship of Defendant's services.

85. Defendant's misleading statements on the web site <www.vitaminshoppeprotein.com> concerning the BODYTECH products misrepresent the nature, characteristics and qualities of Vitamin Shoppe's BODYTECH protein supplements.

86. The metatags associated with the web site <www.vitaminshoppeprotein.com> make misleading representations that a lawsuit involving BODYTECH protein supplements has been filed, which misrepresent the nature, characteristics and qualities of Vitamin Shoppe's BODYTECH protein supplements.

87. Defendant's purchased search term advertisements make false and misleading

representations that a lawsuit involving Vitamin Shoppe's protein supplements has been filed, that Vitamin Shoppe's supplements are dangerous, faulty, and otherwise unsafe, which misrepresent the nature, characteristics and qualities of Vitamin Shoppe's protein supplements.

88. Defendant's actions constitute unfair competition in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a).

89. Defendant's actions have caused and will continue to cause irreparable injury to Vitamin Shoppe unless enjoined by this Court.

90. Vitamin Shoppe has no adequate remedy at law.

COUNT III
(Dilution Under § 43(c) of the Trademark Act)

91. Vitamin Shoppe repeats and incorporates by reference the allegations of paragraphs 1 through 90 of its Complaint as if set forth fully herein.

92. Vitamin Shoppe's trademark THE VITAMIN SHOPPE is famous.

93. Vitamin Shoppe's trademark THE VITAMIN SHOPPE became famous prior to Defendant's use of "Vitamin Shoppe" in the domain name <vitaminshoppeprotein.com>.

94. Defendant's use of <vitaminshoppeprotein.com> is likely to dilute the trademark THE VITAMIN SHOPPE.

95. Defendant's use of <vitaminshoppeprotein.com> is likely to impair the distinctiveness of the trademark THE VITAMIN SHOPPE.

96. Defendant's actions are likely to tarnish the reputation of the trademark THE VITAMIN SHOPPE.

97. Defendant's actions are likely to tarnish Vitamin Shoppe's reputation.

98. Defendant's actions are likely to tarnish the goodwill associated with the trademark THE VITAMIN SHOPPE.

99. Defendant's actions constitute dilution in violation of Section 43(c) of the Lanham Act, 15 U.S.C. § 1125(c).

100. As a result of Defendant's wrongful conduct, Vitamin Shoppe is suffering and will continue to suffer immediate and irreparable harm unless Defendant is enjoined by this Court.

101. Vitamin Shoppe has no adequate remedy at law.

COUNT IV
(Cybersquatting Under § 43(d) of the Trademark Act)

102. Vitamin Shoppe repeats and incorporates by reference the allegations of paragraphs 1 through 101 of its Complaint as if set forth fully herein.

103. Defendant was aware of Vitamin Shoppe when it registered the domain name <vitaminshoppeprotein.com>.

104. Defendant was aware that Vitamin Shoppe sold protein supplements when it registered the domain name <vitaminshoppeprotein.com>.

105. The trademark THE VITAMIN SHOPPE was distinctive at the time Defendant registered the domain name <vitaminshoppeprotein.com>.

106. The trademark THE VITAMIN SHOPPE was famous at the time Defendant registered the domain name <vitaminshoppeprotein.com>.

107. Defendant has a bad faith intent to profit from the trademark THE VITAMIN SHOPPE.

108. Defendant's bad faith intent is evidenced by the false and misleading statements on the web site <www.vitaminshoppeprotein.com>, in the statements in the metatags associated with the web site that indicate an existing lawsuit involving BODTYTECH protein supplements, and in the purchased search term advertisements that Vitamin Shoppe's supplements are faulty.

109. Defendant intends to divert consumers from Vitamin Shoppe's online locations to Defendant's web site <www.vitaminshoppeprotein.com>, which will harm the goodwill represented by the trademark THE VITAMIN SHOPPE, for commercial gain, with intent to tarnish or disparage the trademark THE VITAMIN SHOPPE, and by creating a likelihood of confusion as to the source, sponsorship, affiliation, or endorsement of the web site <www.vitaminshoppeprotein.com>.

110. Defendant intends to lure consumers to Defendant's web site <www.vitaminshoppeprotein.com> which will harm the goodwill represented by the trademark THE VITAMIN SHOPPE, for commercial gain, with intent to tarnish or disparage the trademark THE VITAMIN SHOPPE, and by creating a likelihood of confusion as to the source, sponsorship, affiliation, or endorsement of the web site <www.vitaminshoppeprotein.com>.

111. As a result of Defendant's wrongful conduct, Vitamin Shoppe is suffering and will continue to suffer immediate and irreparable harm unless Defendant is enjoined by this Court.

112. Vitamin Shoppe has no adequate remedy at law.

COUNT V
(Common Law Trademark Infringement and Unfair Competition)

113. Vitamin Shoppe repeats and incorporates by reference the allegations of

paragraphs 1 through 112 of its Complaint as if set forth fully herein.

114. The domain name <vitaminshoppeprotein.com> is confusingly similar to Vitamin Shoppe's registered trademark THE VITAMIN SHOPPE.

115. Defendant's use of the domain name <vitaminshoppeprotein.com> is likely to cause confusion, mistake or deceive the public into believing that the services offered under the web site are sponsored by, approved by, or otherwise associated with Vitamin Shoppe as to cause irreparable damage and injury to Vitamin Shoppe.

116. Defendant's use of the designation BODYTECH is confusingly similar to Vitamin Shoppe's registered trademark BODYTECH.

117. Defendant's use of the designation BODYTECH is likely to cause confusion, mistake or deceive the public into believing that the services offered by Defendant are sponsored by, approved by, or otherwise associated with Vitamin Shoppe as to cause irreparable damage and injury to Vitamin Shoppe.

118. Defendant's use and display of Vitamin Shoppe's BODYTECH trade dress and photographs of BODYTECH protein supplements is confusingly similar to Vitamin Shoppe's registered trademark BODYTECH.

119. Defendant is attempting to trade on and profit from the goodwill associated with the trademarks THE VITAMIN SHOPPE and BODYTECH.

120. Defendant is attempting to falsely suggest an association with Vitamin Shoppe or to trade on the goodwill of the trademarks THE VITAMIN SHOPPE and BODYTECH.

121. Defendant's use of the domain name <vitaminshoppeprotein.com>, the BODYTECH trademark and trade dress, and Vitamin Shoppe's photographs of the BODYTECH

protein supplements is likely to cause confusion as to the source or sponsorship of Defendant's services.

122. Defendant's actions are likely to cause confusion as to the source or sponsorship of Defendant's services.

123. Defendant's actions have been willful, intentional, and in bad faith.

124. Defendant's actions have caused and will continue to cause irreparable injury to Vitamin Shoppe unless enjoined by this Court.

125. Vitamin Shoppe has no adequate remedy at law.

COUNT VI

(New York State Dilution under New York General Business Law § 360-1)

126. Vitamin Shoppe repeats and incorporates by reference the allegations of paragraphs 1 through 125 of its Complaint as if set forth fully herein.

127. Vitamin Shoppe's trademark THE VITAMIN SHOPPE is famous.

128. Vitamin Shoppe's trademark THE VITAMIN SHOPPE became famous prior to Defendant's registration and use of "Vitamin Shoppe" in the domain name <vitaminshoppeprotein.com>.

129. Defendant's use of <vitaminshoppeprotein.com> is likely to dilute the trademark THE VITAMIN SHOPPE.

130. Defendant's actions are likely to dilute the distinctive quality of Vitamin Shoppe's trademark THE VITAMIN SHOPPE in violation of Section 360-1 of the New York General Business Law.

131. Defendant's actions are likely to tarnish the business reputation of Vitamin Shoppe in violation of Section 360-1 of the New York General Business Law.

132. As a result of Defendant's wrongful conduct, Vitamin Shoppe is suffering and will continue to suffer immediate and irreparable harm unless Defendant is enjoined.

133. Vitamin Shoppe has no adequate remedy at law.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, Vitamin Shoppe Industries Inc., respectfully requests the following relief:

A. That the Court find in favor of Vitamin Shoppe in accordance with all Counts of Plaintiff's Complaint;

B. That the Court enter judgment for Vitamin Shoppe and against Defendant on Count I for trademark infringement under 15 U.S.C. § 1114.

C. That the Court enter judgment for Vitamin Shoppe and against Defendant on Count II for unfair competition in violation of 15 U.S.C. § 1125(a).

D. That the Court enter judgment for Vitamin Shoppe and against Defendant on Count III for dilution in violation of 15 U.S.C. § 1125(c).

E. That the Court enter judgment for Vitamin Shoppe and against Defendant on Count IV for cybersquatting in violation of 15 U.S.C. § 1125(d).

F. That the Court enter judgment for Vitamin Shoppe and against Defendant on Count V for trademark infringement and unfair competition under the common law of New York.

G. That the Court enter judgment for Vitamin Shoppe and against Defendant on Count VI for dilution in violation of Section 360-1 of the New York General Business Law.

H. That the Court enter a permanent injunction that Defendant, its heirs, officers,

partners, administrators, employees, agents, servants, representatives, related companies, licensees, successors, assigns, assignees, and all those acting in concert or participation with Defendant, or on behalf of Defendant, from doing, causing, aiding or abetting any of the following:

- a. engaging in any acts or activities directly or indirectly calculated to trade upon the reputation or goodwill of Vitamin Shoppe or the trademarks THE VITAMIN SHOPPE and BODYTECH, or to unfairly compete with Vitamin Shoppe in any manner;
- b. directly or indirectly infringing the trademarks THE VITAMIN SHOPPE and BODYTECH;
- c. using in the sale, offering for sale, promotion, advertising, and marketing of goods or services or in any advertising, catalogs, letterhead, business cards, promotional items, promotional material, on any web site or other materials whatsoever the trademarks THE VITAMIN SHOPPE or BODYTECH or any mark or designation incorporating “Vitamin Shoppe” or “Bodytech” in such manner so as to cause confusion, or be likely to cause confusion, mistake or deceive Vitamin Shoppe's customers and the public into the belief that the services offered by Defendant are approved by, sponsored by, or otherwise associated or connected with Vitamin Shoppe;
- d. using in any manner the designation “Vitamin Shoppe” or “Bodytech” or any other designation or trademark that is identical to or confusingly similar to the trademarks THE VITAMIN SHOPPE or BODYTECH, in any font, style, or

typeface, as a domain name, social media site or address, directory name, or other such computer address; in buried code or in metatags on any web pages for any web sites owned, maintained, sponsored or approved by, associated with, or under the control of Defendant;

- e. using in any manner the trademarks THE VITAMIN SHOPPE or BODYTECH in connection with the offering, advertisement, or promotion of Defendant's services in such a manner that is likely to create the erroneous belief that said services are authorized by, sponsored by, licensed by, approved by, or in some way associated with Vitamin Shoppe; and
- f. otherwise engaging in any other acts or conduct that would cause consumers to believe erroneously that Defendant's services are somehow sponsored by, authorized by, licensed by, approved by, or in any other way are associated with Vitamin Shoppe;

I. That the Court enter an order finding that the trademark THE VITAMIN SHOPPE is distinctive;

J. That the Court enter an order finding that the trademark THE VITAMIN SHOPPE is famous;

K. That the Court enter an order finding that the trademark BODYTECH is distinctive;

L. That the Court enter an order finding that Defendant's use of <vitaminshoppeprotein.com>, VITAMIN SHOPPE, and BODYTECH is confusingly similar to Vitamin Shoppe's trademarks THE VITAMIN SHOPPE and BODYTECH;

M. That the Court enter an order finding that Defendant's use of <vitaminshoppeprotein.com> and VITAMIN SHOPPE dilutes the distinctiveness of the trademark THE VITAMIN SHOPPE;

N. That the Court enter an order finding that Defendant's use of <vitaminshoppeprotein.com> and VITAMIN SHOPPE tarnishes the trademark THE VITAMIN SHOPPE;

O. That the Court enter an order finding that Defendant registered the domain name <vitaminshoppeprotein.com> in bad faith;

P. That the Court enter an order finding that Defendant has a bad faith intent to profit from Vitamin Shoppe's trademark THE VITAMIN SHOPPE;

Q. That the Court order Defendant to immediately transfer to Vitamin Shoppe the domain name registration for <vitaminshoppeprotein.com>;

R. That the Court order an accounting of damages to Vitamin Shoppe arising from Defendant's wrongful conduct and award Vitamin Shoppe such amount;

S. That the Court order Defendant to account to and pay over to Vitamin Shoppe all gains, profits and advantages derived from Defendant's trademark infringement, and unfair competition under Federal and state law;

T. That the Court order Defendant to account to and pay over to Vitamin Shoppe all damages suffered by Vitamin Shoppe as a result of Defendant's trademark infringement, and unfair competition under Federal and state law;

U. That the Court enter an order trebling the amount of the award to Vitamin Shoppe, pursuant to 15 U.S.C. § 1117(a);

V. That the Court award Vitamin Shoppe's costs and expenses in this litigation;

W. That the Court enter judgment that this is an exceptional case under 15 U.S.C.

§1117 and award Vitamin Shoppe its attorneys' fees;

X. That the Court award all damages as allowed by law; and

Y. For such other and further relief as this Court deems just and proper.

DEMAND FOR TRIAL BY JURY

Plaintiff, Vitamin Shoppe Industries Inc., demands a trial by jury as to all issues in this action so triable of right by a jury.

FROSS ZELNICK LEHRMAN & ZISSU, P.C.

Dated: November 21, 2013



Craig S. Mende (cmende@fzlz.com)
Jason D. Jones (jjones@fzlz.com)
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New York, New York 10017
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Fax: (212) 813-5901

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adigman@olsonip.com

Attorneys for Plaintiff Vitamin Shoppe Industries Inc.

EXHIBIT 1

Int. Cls.: 3 and 5

Prior U.S. Cls.: 1, 4, 6, 18, 44, 46, 50, 51 and 52

Reg. No. 2,481,640

United States Patent and Trademark Office

Registered Aug. 28, 2001

**TRADEMARK
PRINCIPAL REGISTER**

THE VITAMIN SHOPPE

VITAMIN SHOPPE INDUSTRIES, INC. (NEW
YORK CORPORATION)
4700 WESTSIDE AVENUE
NORTH BERGEN, NJ 07047

FIRST USE 10-31-1982; IN COMMERCE 10-31-1982.

OWNER OF U.S. REG. NOS. 1,506,651 AND
1,510,646.

FOR: NON-MEDICATED SKIN TREATMENT
CREAMS, HAIR SHAMPOOS AND BATH AND
SHOWER GELS; AND AROMATHERAPY OILS, IN
CLASS 3 (U.S. CLS. 1, 4, 6, 50, 51 AND 52).

NO CLAIM IS MADE TO THE EXCLUSIVE
RIGHT TO USE "VITAMIN", APART FROM THE
MARK AS SHOWN.

FIRST USE 10-31-1982; IN COMMERCE 10-31-1982.

SEC. 2(F).

FOR: VITAMINS, VITAMIN AND MINERAL SUP-
PLEMENTS, AND NUTRITIONAL SUPPLEMENTS,
IN CLASS 5 (U.S. CLS. 6, 18, 44, 46, 51 AND 52).

SER. NO. 75-863,099, FILED 12-2-1999.

M. E. BODSON, EXAMINING ATTORNEY

EXHIBIT 2

Int. Cl.: 35

Prior U.S. Cls.: 100, 101 and 102

Reg. No. 2,481,906

United States Patent and Trademark Office

Registered Aug. 28, 2001

**SERVICE MARK
PRINCIPAL REGISTER**

THE VITAMIN SHOPPE

VITAMIN SHOPPE INDUSTRIES, INC. (NEW
YORK CORPORATION)
4700 WESTSIDE AVENUE
NORTH BERGEN, NJ 07047

OWNER OF U.S. REG. NOS. 1,506,651 AND
1,510,646.

FOR: RETAIL STORE SERVICES, MAIL ORDER
CATALOG SERVICES AND ONLINE RETAIL
STORE SERVICES PROVIDED VIA A GLOBAL
COMPUTER NETWORK FEATURING VITAMINS,
NUTRITIONAL SUPPLEMENTS, BOOKS, HERBAL
PRODUCTS, AROMATHERAPY PRODUCTS, BATH
AND SHOWER PRODUCTS, SKIN TREATMENT
CREAMS, AND RELATED ITEMS, IN CLASS 35 (U.S.
CLS. 100, 101 AND 102).

NO CLAIM IS MADE TO THE EXCLUSIVE
RIGHT TO USE "VITAMIN", APART FROM THE
MARK AS SHOWN.

SEC. 2(F).

SER. NO. 75-980,453, FILED 12-2-1999.

FIRST USE 10-31-1977; IN COMMERCE 10-31-1981.

M. E. BODSON, EXAMINING ATTORNEY

EXHIBIT 3

Int. Cl.: 5

Prior U.S. Cls.: 6, 18, 44, 46, 51 and 52

Reg. No. 2,872,484

United States Patent and Trademark Office

Registered Aug. 10, 2004

Corrected

OG Date Dec. 14, 2004

TRADEMARK
PRINCIPAL REGISTER

BODYTECH

VITAMIN SHOPPE INDUSTRIES INC.
(NEW YORK CORPORATION)
2101 91ST STREET
NORTH BERGEN, NJ 07047

FOR: DIETARY AND NUTRITIONAL
SUPPLEMENTS, IN CLASS 5 (U.S. CLS. 6,
18, 44, 46, 51 AND 52).
FIRST USE 10-31-2001; IN COMMERCE
10-31-2001.
SER. NO. 78-070,985, FILED 6-26-2001.

*In testimony whereof I have hereunto set my hand
and caused the seal of The Patent and Trademark
Office to be affixed on Dec. 14, 2004.*

DIRECTOR OF THE U.S. PATENT AND TRADEMARK OFFICE

EXHIBIT 4

Find out if you are eligible for compensation 800-939-7878
Toll free 24/7



Unhappy with purchasing Protein Supplements?

You may be entitled to compensation.

**Hire a national law firm with
a proven track record.**

**Fill out the form to receive a FREE
Case Evaluation from an attorney**

Did you purchase Protein Supplements?

If you have purchased BodyTech Whey Tech Pro 24, BodyTech 100% Casein, and BodyTech Primal Pro from Vitamin Shoppe®, or any other protein product claiming to have digestive enzymes, contact us now!

You may be eligible to join in our investigation into the manufacturer. Just simply fill out the form to see if you are eligible for a potential protein supplement investigation.

Why choose the Seeger Weiss Law Firm?

[Seeger Weiss, LLP](#) and [The Oliver Law Group PC](#) are leaders in consumer class action lawsuits and complex litigation. With experienced attorneys and office locations across the United States, they strive to obtain the highest quality of service to their clients.

Lauded by the legal community and major publications—Seeger Weiss has “gained the respect of the plaintiffs and defense bar alike for its willingness to ‘always take on the tough cases’ and ‘jump right into the heart of everything when everyone else is afraid,’” according to Legal 500

Vitamin Shoppe Protein Supplement Investigation Overview

The sports nutrition supplement business is a multi-billion dollar a year industry. Topping the charts for sales are protein powder products such as whey, casein, soy and others. With such a demand for these products competition is fierce and many supplement companies try to differentiate their protein powders from the rest.

Whey-based protein powders have solid scientific support for aiding in increased muscle mass, strength and retention of muscle. However, some studies have come out that claim that the human body can only digest a certain amount of protein during a certain

Our 24 Hour Promise

Once you have completed the form above, Seeger Weiss will contact you via phone or email within 24 hours. This service is of no cost to you!

Get Justice. Don't Be a Victim

If you have purchased BodyTech Whey Tech Pro 24, BodyTech 100% Casein, and BodyTech Primal Pro from Vitamin Shoppe®, or any other protein product claiming to have digestive enzymes, you may have more questions than you do answers. Seeger Weiss is here to assist you in every way possible.

While you are understandably focused on your health and wellbeing, there are reasons to investigate the situation.

Your Vitamin Shoppe Protein Supplement Investigation Could Expire

Depending on your situation and the state you live in, there

time period. In an effort to take advantage of this need by consumers to have protein powders which have increased absorption, many companies have turned to digestive enzymes.

may be time sensitive criteria. Do not delay, see if your eligible for a Vitamin Shoppe protein supplement investigation.

Sales of digestive aids and enzymes have grown over the past years reaching \$136 million in the past fiscal year, up 4% from two years ago. Certain companies have chosen to include certain digestive enzymes into their protein powders in an attempt to increase absorption and digestion. Although this sounds like a great idea in theory some manufacturers are using digestive enzymes, which have clinical studies supporting them at dose-dependent levels, but including only a fraction of the level that has been proven to work.

0

So what does that mean for the consumer? It means that although you are looking at a product that includes digestive enzymes, it does not have enough of the compounds to actually do anything. This is the same game many manufacturers use for all types of ingredients. If you have purchased BodyTech Whey Tech Pro 24, BodyTech 100% Casein, and BodyTech Primal Pro from Vitamin Shoppe®, or any other protein product claiming to have digestive enzymes, contact us now!



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[Privacy Policy](#) | [Legal Disclaimer](#)

Seeger Weiss LLP does not offer any guarantee of case results. Past success in litigation does not guarantee success in any new or future lawsuit.

EXHIBIT 5

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rel="home">Vitamin Shoppe Protein Lawsuit</a></h1>
                <h2 class="site-description">Vitamin Shoppe Protein
Lawsuit Information</h2>
            </hgroup>

            <nav role="navigation" class="site-navigation main-navigation">
                <h1>Find out if you are eligible for compensation 800-939-
7878</h1>
                <h2>Toll free 24/7</h2>
            </nav><!-- .site-navigation .main-navigation -->
        </div>
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    <header class="entry-header">
    </header><!-- .entry-header -->

    <div class="entry-content">
        <h2>Did you purchase Protein Supplements?</h2>
        <p>If you have purchased BodyTech Whey Tech Pro 24, BodyTech 100% Casein, and
BodyTech Primal Pro from Vitamin Shoppe®, or any other protein product claiming to
have digestive enzymes, contact us now!</p>
        <p>You may be eligible to join in our investigation into the manufacturer. Just
simply fill out the form to see if you are eligible for a potential protein
supplement investigation.</p>
        <hr />
        <h2>Why choose the Seeger Weiss Law Firm?</h2>
        <p><a href="http://www.seegerweiss.com/">Seeger Weiss, LLP</a> and <a
href="http://www.legalactionnow.com/">The Oliver Law Group PC</a> are leaders in
consumer class action lawsuits and complex litigation. With experienced attorneys
and office locations across the United States, they strive to obtain the highest
quality of service to their clients.</p>
        <p>Lauded by the legal community and major publications—Seeger Weiss has “gained the
respect of the plaintiffs and defense bar alike for its willingness to ‘always take
on the tough cases’ and ‘jump right into the heart of everything when everyone else
is afraid,’” according to Legal 500</p>
        <hr />

```

<h2>Vitamin Shoppe Protein Supplement Investigation Overview</h2>

<p>The sports nutrition supplement business is a multi-billion dollar a year industry. Topping the charts for sales are protein powder products such as whey, casein, soy and others. With such a demand for these products competition is fierce and many supplement companies try to differentiate their protein powders from the rest.</p>

<p>Whey-based protein powders have solid scientific support for aiding in increased muscle mass, strength and retention of muscle. However, some studies have come out that claim that the human body can only digest a certain amount of protein during a certain time period. In an effort to take advantage of this need by consumers to have protein powders which have increased absorption, many companies have turned to digestive enzymes.</p>

<p>Sales of digestive aids and enzymes have grown over the past years reaching \$136 million in the past fiscal year, up 4% from two years ago. Certain companies have chosen to include certain digestive enzymes into their protein powders in an attempt to increase absorption and digestion. Although this sounds like a great idea in theory some manufacturers are using digestive enzymes, which have clinical studies supporting them at dose-dependent levels, but including only a fraction of the level that has been proven to work.</p>

<p>So what does that mean for the consumer? It means that although you are looking at a product that includes digestive enzymes, it does not have enough of the compounds to actually do anything. This is the same game many manufacturers use for all types of ingredients. If you have purchased BodyTech Whey Tech Pro 24, BodyTech 100% Casein, and BodyTech Primal Pro from Vitamin Shoppe®, or any other protein product claiming to have digestive enzymes, contact us now!</p>

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</div></aside><aside id="wysiwyg_widgets_widget-3" class="widget
widget_wysiwyg_widgets_widget"><h1 class="widget-title">Our 24 Hour Promise</h1>
<div><p>Once you have completed the form above, Seeger Weiss will contact you via
phone or email within 24 hours. This service is of no cost to you!</p>
</div></aside><aside id="wysiwyg_widgets_widget-5" class="widget
widget_wysiwyg_widgets_widget"><h1 class="widget-title">Get Justice. Don't Be
a Victim</h1><div><p>If you have purchased BodyTech Whey Tech Pro 24, BodyTech 100%
Casein, and BodyTech Primal Pro from Vitamin Shoppe®, or any other protein product
claiming to have digestive enzymes, you may have more questions than you do answers.
Seeger Weiss is here to assist you in every way possible.</p>
<p>While you are understandably focused on your health and wellbeing, there are
reasons to investigate the situation.</p>
<p><strong>Your Vitamin Shoppe Protein Supplement Investigation Could Expire<br />
</strong>Depending on your situation and the state you live in, there may be time
sensitive criteria. Do not delay, see if your eligible for a Vitamin Shoppe protein
supplement investigation.</p>
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widget_wysiwyg_widgets_widget"><h1 class="widget-title">Copyright © 2013 Seeger
Weiss LLP. All Rights Reserved. | Office Locations in New York, New Jersey and
Pennsylvania. </h1><h3 style="text-align: center;"></h3>
<h2 style="text-align: center;">Call Us Toll Free at (800) 939-7878</h2>
<p style="text-align: center;"><span style="color: #ffffff;"><a
href="http://www.vitaminshoppeprotein.com/privacy-policy/"><span style="color:
#ffffff;">Privacy Policy</span></a></span> | <span style="color: #ffffff;"><a
href="http://www.vitaminshoppeprotein.com/disclaimer/"><span style="color:

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#ffffff;">Legal Disclaimer</span></a></span></p>
<p style="text-align: center;">Seeger Weiss LLP does not offer any guarantee of case
results. Past success in litigation does not guarantee success in any new or future
lawsuit.</p>
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</div><!-- #page .hfeed .site -->

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EXHIBIT 6

vitaminshoppeprotein.com

Sign in

Web

Images

Maps

Shopping

Videos

More ▾

Search tools

About 291 results (0.27 seconds)

Did you mean: [vitamin shoppe protein](#)

Ad related to vitaminshoppeprotein.com

[Vitamin Shoppe Sale - Up to 60% Off on Leading Brands](#)[www.vitaminshoppe.com/](#) ▾

15,220 reviews for vitaminshoppe.com

Free Shipping on Orders Over \$25!

The Vitamin Shoppe has 85,681 followers on Google+

[Shop By Brand](#)[Sports Nutrition](#)[Browse All Vitamins](#)[Save Over 40%](#)**[Vitamin Shoppe Investigation- Protein Supplements Class...](#)**[www.vitaminshoppeprotein.com/](#) ▾

If you purchased Vitamin Shoppe Protein supplements you may be eligible to file a claim against the manufacturer. Fill out the form to see if you are eligible!

[admin, Author at Vitamin Shoppe Protein Lawsuit](#)[www.vitaminshoppeprotein.com/author/lakehousesseo/](#) ▾

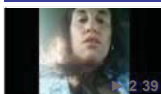
If you have purchased BodyTech Whey Tech Pro 24, BodyTech 100% Casein, and BodyTech Primal Pro from Vitamin Shoppe®, or any other protein product ...

[Privacy Policy | Vitamin Shoppe Protein Lawsuit](#)[www.vitaminshoppeprotein.com/privacy-policy/](#) ▾

By accessing or using the "http://www.vitaminshoppeprotein.com" site, you acknowledge that you have read, understood and accept this privacy policy and its ...

[Disclaimer | Vitamin Shoppe Protein Lawsuit](#)[www.vitaminshoppeprotein.com/disclaimer/](#) ▾

Disclaimer. Seeger Weiss LLP does not offer any guarantee of case results. Past success in litigation does not guarantee success in any new or future lawsuit.

[30lb Weight Loss Challenge Vlog \(Vitamin Shoppe - Prote...](#)[www.youtube.com/watch?v=RtiaUG4pjWQ](#) ▾

Oct 25, 2011 - Uploaded by Shardonay G

Trip to Vitamin Shoppe to purchase "Lean Dessert" product by BSN; however, I ended up with Syntha-6 ...

[Who Makes Vitamin Shoppe Protein? - Bodybuilding.com...](#)[forum.bodybuilding.com](#) ▸ [Main Forums](#) ▸ [Supplements](#) ▾

Feb 12, 2012 - 14 posts - 11 authors

Pretty sure **Vitamin shoppe protein** is actually Dymatize not ON.

Titanium Whey Tropical Berry Genomx EVOL Genomx SS V1 Nimbus Abyss ...

[Trutein Protein Blend](#)

3 posts

Mar 23, 2011

[Universal Real Gains helping my 92 year old ...](#)

16 posts

Jun 8, 2010

[More results from forum.bodybuilding.com](#)**[Calories in Bodytech Vitamin Shoppe Protein Pudding - C...](#)**[www.myfitnesspal.com/.../bodytech-vitamin-shoppe-protein-pudding-19...](#) ▾

Calories in Bodytech Vitamin Shoppe Protein Pudding. Find nutrition facts for Bodytech Vitamin Shoppe Protein Pudding and over 2000000 other foods in ...

[Calories in Vitamin Shoppe Protein Pudding and Nutrition...](#)[www.fatsecret.com](#) ▸ [Foods](#) ▸ [Brand List](#) ▸ [Vitamin Shoppe](#) ▾

Jan 18, 2011 - There are 135 calories in a 1 packet serving of Vitamin Shoppe Protein Pudding. Get full nutrition facts for other Vitamin Shoppe products and ...

[Best Vitamin Shoppe Protein Powders. Compare, reviews...](#)

[protein-powder.findthebest.com](#) › [Health](#) › [Protein Powder](#) ▼

Find and compare the best Vitamin Shoppe protein powders based on nutrition facts such as protein, carbohydrates, sugar, fat, calories, calories per gram and ...

[vitaminshoppeprotein.com](#) : information about this newly...

[wschange.com/new/2013/08/30/vitaminshoppeprotein.com](#)

Aug 30, 2013 - vitaminshoppeprotein.com : information about this newly registered domain name the 2013-08-30 - WSChange.com.

Ad related to [vitaminshoppeprotein.com](#)

[10% off Vitamins - Buy 2 & get 4 for free](#)

[www.puritan.com/](#) ▼

401 seller reviews

Plus Free Shipping today.

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EXHIBIT 7



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[About Google](#)

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★★★★★ Rating: 4.5 - 9 reviews - Price range: \$\$

9 Reviews of The Vitamin Shoppe "So I have seen the Vitamin Shoppe (VS) for awhile now but have typically bought my supplements at Whole Foods (WF).

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5 Reviews of The Vitamin Shoppe "Great place The prices are fair, the selection is there. If you want a certain vitamin, supplement, protein powder or some type ...

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10 Reviews of The Vitamin Shoppe "I walked in and ten seconds later someone asked me what I was looking for and pointed me right to the vitamin ...

The Vitamin Shoppe - West San Jose - San Jose, CA - Yelp

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45 Reviews of The Vitamin Shoppe "I usually buy vitamins and supplements online but when I'm caught empty handed with little patience to wait for shipping I ...

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11 Reviews of The Vitamin Shoppe "Great prices...better than most others. I stick with the shops own brand vitamins. Their Vitamin B Complex veggie caps are ...

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The Vitamin Shoppe - Bucktown - Chicago, IL - Yelp

www.yelp.com > Food > Specialty Food > Health Markets

★★★★★ Rating: 3 - 8 reviews - Price range: \$\$
8 Reviews of The Vitamin Shoppe "Easy private parking lot. Keep your smartphone handy becau they will honor vitamin shoppe online web pricing...saved me ...

The Vitamin Shoppe - Lincoln Park - Chicago, IL - Yelp

www.yelp.com > Food > Specialty Food > Health Markets

★★★★★ Rating: 4.5 - 21 reviews - Price range: \$\$
21 Reviews of The Vitamin Shoppe "Really great store. Nice location, convenient. Staff is exceptional. I was asked not once, not twice, but three times if I needed ...

The Vitamin Shoppe - Wikipedia, the free encyclopedia

en.wikipedia.org/wiki/The_Vitamin_Shoppe

The Vitamin Shoppe (formally Vitamin Shoppe Industries, Inc.) is a New Jersey-based retailer of nutritional supplements with 500+ locations in 37 states.

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The Vitamin Shoppe

49,180 followers on Google+



The Vitamin Shoppe is a New Jersey-based retailer of nutritional supplements with 500+ locations in 37 states. They also operate stores in Canada under the name "VitaPath". Wikipedia

Headquarters: North Bergen, NJ

Stock price: VSI (NYSE) \$43.75 +0.26 (+0.60%)

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